

The Honorable Lauren King

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

DECLARATION OF WILLIAM  
MCGINTY IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION FOR STAY  
OF PROCEEDINGS PENDING APPEAL  
OF PRELIMINARY INJUNCTION

NOTE ON MOTION CALENDAR:  
Friday, April 4, 2025

I, William McGinty, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge. I am one of the attorneys representing Plaintiff State of Washington in the above-captioned matter.

2. On March 19, 2025, Plaintiffs propounded discovery requests on Defendants in this matter. True and correct copies of the discovery requests, consisting of interrogatories, requests for production, a notice of deposition, and a subpoena duces tecum, are attached to this declaration as Exhibit A.

3. On March 25, 2025, Plaintiffs, after consulting with Defendants about dates that they would be available for depositions, amended the notice of deposition and the subpoena duces tecum originally propounded on March 19, and also notified Defendants of third-party discovery Plaintiffs intend to take. True and correct copies of the amended notice of deposition,

1 the amended subpoena duces tecum, and the new subpoena duces tecum are attached to this  
2 declaration as Exhibit B.

3 4. On March 28, 2025, at 9:00 a.m. Pacific Time the parties held a Rule 26(f)  
4 conference, and discussed each of the items directed by the Court in its Order Regarding Initial  
5 Disclosures, Joint Status Report, and Early Settlement (Dkt. #260).

6 5. On March 28, 2025, at approximately 12:30 p.m. Pacific Time Plaintiffs served  
7 a notice of deposition on Defendants for the deposition of Dr. Matthew Memoli to be had on  
8 April 22, 2025. A true and correct copy of the notice of deposition is attached to this declaration  
9 as Exhibit C.

10 I declare under penalty of perjury under the laws of the State of Washington and the  
11 United States of America that the foregoing is true and correct.

12 DATED this 31st day of March 2025 at Olympia, Washington.

13  
14 /s/ William McGinty

15 WILLIAM MCGINTY, WSBA #41868  
16 Assistant Attorney General  
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